IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: BPS DIRECT, LLC and CABELA'S, LLC, WIRETAPPING

MDL NO. 3074 2:23-md-03074-MAK

PROPOSED AGENDA FOR STATUS CONFERENCE

The parties, by and through undersigned counsel, having conferred pursuant to Case Management Order No. 1 (Doc. 52 at 9) submit to the Court the following proposed agenda for the telephonic status conference to be held October 23, 2023.

I. <u>Proposed Agenda</u>

The Parties propose the following topics for discussion at the telephonic status conference:

- A. Confidentiality Agreement Between the Parties
- B. Status of Written Discovery and Document Productions
- C. Status of Deposition Discovery
- D. Third-Party Discovery
- E. Status of the *Irvin* matter, 23-cv-4008

The Parties are also happy to discuss anything else the Court would like or feels would aid the efficient resolution of the matter.

Date: October 19, 2023 By: /s/ Kate M. Baxter-Kauf

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